

1 CAMPBELL & WILLIAMS  
2 PHILIP R. ERWIN, ESQ. (11563)  
[pre@cwlawlv.com](mailto:pre@cwlawlv.com)  
3 SAMUEL R. MIRKOVICH (11662)  
[srm@cwlawlv.com](mailto:srm@cwlawlv.com)  
4 ARIANA N. REED (15310)  
[anr@cwlawlv.com](mailto:anr@cwlawlv.com)  
5 710 South Seventh Street, Suite A  
6 Las Vegas, Nevada 89101  
Telephone: (702) 382-5222  
Facsimile: (702) 382-0540

7 *Attorneys for Defendant*  
8 *LNW Gaming, Inc.*

9  
10 **UNITED STATES DISTRICT COURT**  
11  
12 **DISTRICT OF NEVADA**

13 CASE NO.: 2:21-cv-01953-APG-EJY

14 **STIPULATION AND [PROPOSED]**  
15 **ORDER TO EXTEND TIME TO**  
16 **RESPOND TO COUNTERCLAIM AND**  
17 **SET BRIEFING SCHEDULE**

18  
19 **(FIRST REQUEST)**

20 RES EXHIBIT SERVICES, LLC, a New  
York limited liability company;

21 Plaintiff,

22 vs.

23 LNW GAMING, INC. f/k/a SG GAMING,  
INC. f/k/a BALLY GAMING, INC., a  
Nevada corporation,

24 Defendant,

25 LNW GAMING, INC. f/k/a SG GAMING,  
INC. f/k/a BALLY GAMING, INC., a  
Nevada corporation;

26 Counterclaimant,

27 vs.

28 RES EXHIBIT SERVICES, LLC; a New  
York limited liability company; JAMES  
LEONARDO, an individual; JERI  
WIEDEMER, an individual; and ROBERT  
REYES, an individual,

Counterdefendants.

CAMPBELL & WILLIAMS  
ATTORNEYS AT LAW  
710 SOUTH SEVENTH STREET, SUITE A, LAS VEGAS, NEVADA 89101  
Phone: 702.382.5222 • Fax: 702.382.0540  
[www.campbellandwilliams.com](http://www.campbellandwilliams.com)

Pursuant to LR IA 6-1, Defendant/Counterclaimant LNW Gaming, Inc. f/k/a SG Gaming, Inc. f/k/a Bally Gaming, Inc. (“LNW Gaming”) and Counterdefendants Jeri Wiedemer (“Wiedemer”) and Robert Reyes (“Reyes”) (collectively, the “Parties”), by and through their undersigned counsel of record, hereby request and stipulate to the entry of an order to extend Wiedemer’s and Reyes’s time to respond to LNW Gaming’s Counterclaim (ECF No. 62) and set a briefing schedule on their forthcoming motions to dismiss.

1. Pursuant to the Court’s Order granting leave to amend (ECF No. 60), LNW Gaming filed its Counterclaim on October 3, 2023 (ECF No. 62).

2. Wiedemer and Reyes each accepted service of the Counterclaim and Summons on October 11, 2023 (ECF Nos. 69-70), and notified LNW Gaming they each intend to file separate motions to dismiss in response to the Counterclaim.

3. The Parties, in turn, agreed to extend Wiedemer’s and Reyes’s time to respond to the Counterclaim until November 20, 2023 and to set the following briefing schedule on their respective motions to dismiss:

<u>BRIEF</u>	<u>DUE DATE</u>
Motions to Dismiss	November 20, 2023
Opposition	December 11, 2023
Replies	December 22, 2023

CAMPBELL & WILLIAMS  
ATTORNEYS AT LAW  
710 SOUTH SEVENTH STREET, SUITE A, LAS VEGAS, NEVADA 89101  
Phone: 702.382.5222 • Fax: 702.382.0540  
[www.campbellandwilliams.com](http://www.campbellandwilliams.com)

1 IT IS SO STIPULATED.  
IT IS SO STIPULATED.

2 Dated this 25th day of October, 2023.

3 CAMPBELL & WILLIAMS

4 By: /s/ Philip R. Erwin

5 PHILIP R. ERWIN, ESQ. (11563)  
SAMUEL R. MIRKOVICH (11662)  
ARIANA N. REED (15310)  
710 South Seventh Street, Suite A  
Las Vegas, Nevada 89101

8 *Attorneys for LNW Gaming, Inc.*

9 Dated this 25th day of October, 2023.

10 PEEK LAW

11 By: /s/ Erica C. Medley

12 J. STEPHEN PEEK, ESQ. (1758)  
2209 Fiero Drive  
Las Vegas, Nevada 89134

13 - and -

14 ERICA C. MEDLEY  
15 HOLLAND & HART LLP  
16 9555 Hillwood Dr., 2nd Floor  
17 Las Vegas, Nevada 89134

18 *Attorneys for Jeri Wiedemer*

19 Dated this 25th day of October, 2023.

20 FLANGAS LAW GROUP

21 By: /s/ Kimberly P. Stein

22 KIMBERLY P. STEIN, ESQ. (8675)  
3275 South Jones Blvd., Suite 105  
Las Vegas, Nevada 89146

23 *Attorneys for Robert Reyes*

24 C A M P B E L L & W I L L I A M S  
25 ATTORNEYS AT LAW  
26 710 SOUTH SEVENTH STREET, SUITE A, LAS VEGAS, NEVADA 89101  
27 Phone: 702.382.5222 • Fax: 702.382.0540  
28 www.campbellandwilliams.com

## **ORDER**

1. IT IS HEREBY ORDERED, ADJUDGED, and DECREED that the time for Counterdefendants Jeri Wiedemer and Robert Reyes to respond to LNW Gaming's Counterclaim shall be extended until November 20, 2023.

3. IT IS FURTHER ORDERED that the Parties shall comply with the following briefing schedule on Counterdefendants Jeri Wiedemer's and Robert Reyes's forthcoming Motions to Dismiss:

## MOTIONS TO DISMISS

<u>BRIEF</u>	<u>DUE DATE</u>
Motions to Dismiss	November 20, 2023
Opposition	December 11, 2023
Replies	December 22, 2023

## **IT IS SO ORDERED.**

Eayna J. Zouchah  
U.S. MAGISTRATE JUDGE

DATED: October 26, 2023